

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARON R. BAIRD :
v. : MISC.NO.170166
1600 CHURCH ROAD CONDOMINIUM :
ASSOCIATION :
:

COMPLAINT

COMES NOW Petitioner, Sharon Baird, and represents to this Honorable Court the following:

COUNT I

1. Plaintiff, Petitioner, Sharon R. Baird, purchased a condominium from Defendant in late 2005, moving in in February 2006 with her one Chihuahua emotional therapy dog that had been approved to be present in Petitioner's Condominium – in contradiction to a Condominium Association Covenant barring pets – at or around that time; Petitioner had been informed of this approval by the then manager 'Helen.'

WHEREFORE, for the foregoing reason(s), Petitioner respectfully requests this Court grant Injunctive relief against Defendant herein compelling they cease and desist with any and all activities relating to compelling Petitioner to permanently remove her now two (2) 3 and 4 pound Chihuahua canines currently 12 and 6 years of age from her Condominium A-105 at Defendant's address.

COUNT II

2. Plaintiff, Petitioner, Sharon Baird, has suffered from anxiety attacks, *inter alia*, first diagnosed at age 6, and has been seeing therapists the majority of her life as a result thereof.
3. After enduring a divorce in 2002, after a 20 year relationship with the husband she married in 1987, and Petitioner having commenced once more to see therapists in 1997 – as her marriage deteriorated - Petitioner purchased a 4 pound (now 3 pound) Chihuahua canine male puppy in 2005.
4. The canine provided positive emotional support to Petitioner in her new unmarried status, continues to do so to this day, and said positive emotional support was, and continues to be, noted by her therapists, including her Psychiatrist from 2007, Kenneth M. Kron, M.D.
5. Petitioner suffers from a disability recognized under the Americans with Disabilities Act, the full details of said disability extend beyond mere anxiety attacks and the medical file revealing same, it is here respectfully requested, ought solely be shared *in camera* by the Court, should the Court so request.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests this Court grant Injunctive relief against Defendant herein compelling they cease and desist with any and all activities relating to compelling Petitioner to permanently remove her now two (2) 3 and 4 pound Chihuahua canines currently 12 and 6 years of age from her Condominium A-105 at Defendant's address.

COUNT III

6. Petitioner herein asserts Defendant's herein, its current Board and its Property Manager and Management Company, either knew of Petitioner's disability at the outset of their state court filing in or before 2015, or at a time or times certain through that 2015-2017 Court of Common Pleas of Montgomery County litigation became aware of same, yet continued to prosecute said litigation, intentionally persecuting Petitioner, an individual already struggling with significant emotional challenges – said actions by Defendant, with the possible knowledge of their attorney – enormously exacerbating Petitioner's symptoms leading to, *inter alia*, new and intense eczema, sleep deprivation and depression.

7. Petitioner asserts these acts are violative of the Dragonetti Act and actionable by Petitioner and this Court.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests this Court grant Injunctive relief against Defendant herein compelling they cease and desist with any and all activities relating to compelling Petitioner to permanently remove her now two (2) 3 and 4 pound Chihuahua canines currently 12 and 6 years of age from her Condominium A-105 at Defendant's address.

Respectfully submitted,

/S/Peter Blust Esquire

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